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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
INVERSIDE

BY: _____

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
September 2012 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

RALPH KENNETH DELEON,
aka "Ralph De Leon,"
aka "Rafiq Abdul Raheem,"
aka "Ya Seen,"
aka "Ya Sin,"
MIGUEL ALEJANDRO VIDRIALES
SANTANA,
aka "Miguel Santana,"
aka "Muhammad Khalid
Mikaeel Khattab," and
ARIFEEN DAVID GOJALI,
aka "Arifeen Ghazali,"
aka "Arifeen Ghozali,"
aka "Arifeendavud
Gojali,"

Defendants.

ED No. CR 12- 92 VAP

I N D I C T M E N T

[18 U.S.C. § 2339A: Conspiracy to
Provide Material Support to
Terrorists]

The Grand Jury charges:

[18 U.S.C. § 2339A]

Beginning in or around August 2010 and continuing up to and
including November 16, 2012, in San Bernardino and Los Angeles

1 Counties, within the Central District of California, and elsewhere,
2 defendants RALPH KENNETH DELEON, also known as ("aka") "Ralph De
3 Leon," aka "Rafiq Abdul Raheem," aka "Ya Seen," aka "Ya Sin"
4 ("DELEON"); MIGUEL ALEJANDRO VIDRIALES SANTANA, aka "Miguel
5 Santana," aka "Muhammad Khalid Mikaeel Khattab" ("SANTANA"); ARIFEEN
6 DAVID GOJALI, aka "Arifeen Ghazali," aka "Arifeen Ghozali," aka
7 "Arifeendavud Gojali" ("GOJALI"); and others known and unknown to
8 the grand jury; conspired and agreed with each other to provide
9 material support and resources, as that term is defined in Title 18,
10 United States Code, Section 2339A(b)(1), including property,
11 services, and personnel, including themselves, knowing and intending
12 that they were to be used in preparation for, and in carrying out,
13 violations of the following federal laws:

14 a. Title 18, United States Code, Section 956 (conspiracy
15 to commit at a place outside the United States an act that would
16 constitute the offense of murder, kidnapping, or maiming, if
17 committed in the special maritime and territorial jurisdiction of
18 the United States, where one of the conspirators committed an act
19 within the jurisdiction of the United States to effect an object of
20 the conspiracy);

21 b. Title 18, United States Code, Section 1114 (killing
22 and attempting to kill officers and employees of the United States
23 and of any agency or branch of the United States (including members
24 of the uniformed services), while such officers and employees were
25 engaged in or on account of the performance of official duties, and
26 any person assisting such officers and employees);

1 c. Title 18, United States Code, Sections 2332(a) and
2 (b) (killing, attempting, and conspiring to kill, a national of the
3 United States while such national is outside the United States);

4 d. Title 18, United States Code, Section 2332a(b)
5 (using, and threatening, attempting, and conspiring to use, a weapon
6 of mass destruction outside of the United States); and

7 e. Title 18, United States Code, Section 2332f
8 (delivering, placing, discharging, and detonating, and attempting
9 and conspiring to deliver, place, discharge, and detonate, an
10 explosive or other lethal device into or against a place of public
11 use, a state or government facility, a public transportation system,
12 and an infrastructure facility, with the intent to cause death and

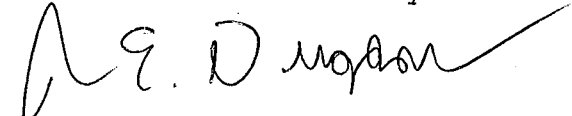
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1 serious bodily injury and to cause extensive destruction to such
2 places, facilities, and systems).

3 A TRUE BILL

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6 Foreperson

7 ANDRÉ BIROTTE JR.
8 United States Attorney

9 

10 ROBERT E. DUGDALE
11 Assistant United States Attorney
12 Chief, Criminal Division

13 PATRICK R. FITZGERALD
14 Assistant United States Attorney
15 Chief, National Security Section

16 SUSAN J. De WITT
17 Assistant United States Attorney
18 Deputy Chief, National Security Section

19 CHRISTOPHER D. GRIGG
20 Assistant United States Attorney
21 National Security Section
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